

WACHTELL, LIPTON, ROSEN & KATZ

MARTIN LIPTON
HERBERT M. WACHTELL
PAUL VIZCARRONDO, JR.
PETER C. HEIN
HAROLD S. NOVIKOFF
MEYER G. KOPLOW
THEODORE N. MIRVIS
EDWARD D. HERLIHY
DANIEL A. NEFF
ANDREW R. BROWNSTEIN
MICHAEL H. BYOWITZ
PAUL K. ROWE
MARC WOLINSKY
DAVID GRUENSTEIN
STEVEN A. ROSENBLUM
STEPHANIE J. SELIGMAN
JOHN F. SAVARESE
SCOTT K. CHARLES
JODI J. SCHWARTZ
ADAM O. EMMERICH
GEORGE T. CONWAY III

RALPH M. LEVENE
RICHARD G. MASON
MICHAEL J. SEGAL
DAVID M. SILK
ROBIN PANOVKA
DAVID A. KATZ
ILENE KNABLE GOTTS
DAVID M. MURPHY
JEFFREY M. WINTNER
TREVOR S. NORWITZ
BEN M. GERMANA
ANDREW J. NUSSBAUM
RACHELLE SILVERBERG
STEVEN A. COHEN
DEBORAH L. PAUL
DAVID C. KARP
RICHARD K. KIM
JOSHUA R. CAMMAKER
MARK GORDON
JOSEPH D. LARSON
LAWRENCE S. MAKOW

**51 WEST 52ND STREET
NEW YORK, N.Y. 10019-6150
TELEPHONE: (212) 403-1000
FACSIMILE: (212) 403-2000**

GEORGE A. KATZ (1965-1989)
JAMES H. FOGLSON (1967-1991)
LEONARD M. ROSEN (1965-2014)

OF COUNSEL

WILLIAM T. ALLEN	DAVID S. NEILL
PETER C. CANELLOS	BERNARD W. NUSSBAUM
DAVID M. EINHORN	LAWRENCE B. PEDOWITZ
KENNETH B. FOREST	ERIC S. ROBINSON
THEODORE GEWERTZ	PATRICIA A. ROBINSON*
MAURA R. GROSSMAN	ERIC M. ROTH
RICHARD D. KATCHER	MICHAEL W. SCHWARTZ
DOUGLAS K. MAYER	ELLIOTT V. STEIN
ROBERT B. MAZUR	WARREN R. STERN
PHILIP MINDLIN	PATRICIA A. VLAHAKIS
ROBERT M. MORGENTHAU	AMY R. WOLF

JEANNEMARIE O'BRIEN
WAYNE M. CARLIN
STEPHEN R. DI PRIMA
NICHOLAS G. DEMMO
IGOR KIRMAN
JONATHAN M. MOSES
T. EIKO STANGE
DAVID A. SCHWARTZ
JOHN F. LYNCH
WILLIAM SAVITT
ERIC M. ROSOF
MARTIN J.E. ARMS
GREGORY E. OSTLING
DAVID B. ANDERS
ANDREA K. WAHLQUIST
ADAM J. SHAPIRO
NELSON O. FITTS
JOSHUA M. HOLMES
DAVID E. SHAPIRO
DAMIAN G. DIDDEN
ANTE VUCIC

IAN BOCKZO
MATTHEW M. GUEST
DAVID E. KAHAN
DAVID K. LAM
BENJAMIN M. ROTH
JOSHUA A. FELTMAN
ELAINE P. GOLIN
EMIL A. KLEINHAUS
KARESSA L. CAIN
RONALD C. CHEN
GORDON S. MOODIE
DONGJU SONG
BRADLEY R. WILSON
GRAHAM W. MELI
GREGORY E. PESSIN
CARRIE M. REILLY
MARK F. VEBLEN
VICTOR GOLDFELD
EDWARD J. LEE
BRANDON C. PRICE
KEVIN S. SCHWARTZ

* ADMITTED IN THE DISTRICT OF COLUMBIA

COUNSEL

DAVID M. ADLERSTEIN	PAULA N. GORDON
AMANDA K. ALLEXON	NANCY B. GREENBAUM
LOUIS J. BARASH	MARK A. KOENIG
DIANNA CHEN	J. AUSTIN LYONS
ANDREW J.H. CHEUNG	ALICIA C. McCARTHY
PAMELA EHRENKRANZ	SABASTIAN V. NILES
KATHRYN GETTLES-ATWA	AMANDA N. PERSAUD
ADAM M. GOGOLAK	JEFFREY A. WATIKER

DIRECT Dial: (212) 403-1226

DIRECT FAX: (212) 403-2226

MWOLINSKY@WLRK.COM

October 5, 2015

BY ELECTRONIC FILING

The Honorable Gregory H. Woods
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: *Employees' Retirement System of the City of Montgomery v. JPMorgan Chase Bank, N.A.*, 1:15-cv-6002-GHW, and

Oakland Police & Fire Retirement System v. JPMorgan Chase Bank, N.A., 1:15-cv-6007-GHW

Dear Judge Woods:

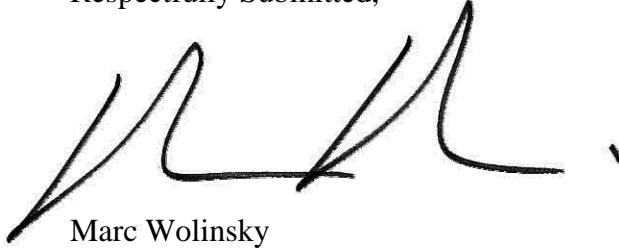
We represent defendant JPMorgan Chase Bank, N.A. ("JPMorgan") in the above-captioned, related actions along with Kelley, Drye & Warren LLP. As indicated in our August 28, 2015 letter (*Montgomery* Dkt. No. 5; *Oakland* Dkt. No. 14), the parties have now negotiated a stipulation and proposed order whereby defendants will accept service, the two cases will be consolidated, and a schedule will be set for the filing of a consolidated, amended complaint and defendants' motions to dismiss or other responses to such complaint. A copy of the stipulation and proposed order is attached as Exhibit A hereto.

The Honorable Gregory H. Woods
October 5, 2015
Page 2

Pursuant to Your Honor's individual practices and Rule 18.3 of the SDNY ECF Rules and Instructions, the parties are simultaneously with this letter submitting the stipulation and proposed order to the Orders and Judgments Clerk via email.

We are available to answer any questions the Court may have regarding this stipulation and proposed order.

Respectfully Submitted,



A handwritten signature in black ink, appearing to read "M. WOLINSKY".

Marc Wolinsky

cc: Counsel of Record (by ECF)
John Villa (counsel for Simpson Thacher) (by email)